



September 14, 2020

Via ECF only

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 1305
New York, New York 10007
EngelmayerNYSChambers@nysd.uscourts.gov

Re: Roc Nation LLC v. HCC International Insurance Company, PLC
Venue: US District Court - Southern District of New York
Case No.: 1:19-cv-00554-PAE

Dear Judge Engelmayer:

This firm is legal counsel to Houston Casualty Company (“HCC”), improperly pled as HCC International Insurance Company, PLC, regarding the above-referenced matter. We write to request permission, pursuant to § 4.B of Your Honor’s individual rules and practices, to file the following exhibits in support of HCC’s Motion for Summary Judgment, and in opposition to Roc Nation’s Motion for Summary Judgment, under seal:

1. Exhibit P, portions of the deposition transcript of Desiree Perez (entire transcript having been marked confidential);
2. Exhibit Q, portions of the deposition transcript of Joseph Borrino (entire transcript having been marked confidential);
3. Exhibit R, portions of the deposition transcript of David Keoshgerian (entire transcript having been marked confidential);
4. Exhibit S, portions of the deposition transcript of Hal Blackman (entire transcript having been marked confidential).

HCC also requests permission to file of the following documents with narrowly tailored redactions:

1. HCC’s Memorandum of Law in Opposition to Plaintiff’s Motion and in Support of Defendant’s Motion for Summary Judgment;
2. HCC’s Objections and Responses to Plaintiff’s Statement of Material Facts.

In accordance with Your Honor’s instructions, the documents have been uploaded via ECF with a limited viewing level restricting viewing to selected parties as we await Your Honor’s review of these documents and decision.

VOGRIN & FRIMET, LLP

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Defendant seeks to file the aforementioned documents under seal or with limited redactions as they contain sensitive and confidential information pertaining to Plaintiff's business operations, financial information, and proprietary information as well as like information pertaining to individuals and entities that are not parties to this litigation. This information is not available within the public domain and was contemplated by the parties when they jointly drafted and entered into the confidentiality order entered by Your Honor on August 6, 2019. *See* Document No. 42.

Good cause exists for granting this request to file the above-referenced documents under seal so that it may include these documents in HCC's Motion for Summary Judgment and Opposition to Roc Nation's Motion for Summary Judgment.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/George J. Vogrin
George J. Vogrin

Granted.

SO ORDERED.

Paul A. Engelmayer
PAUL A. ENGELMAYER
United States District Judge

September 15, 2020